

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
STEVEN TILCHEN,

Plaintiff,

-against-

CEMD ELEVATOR CORP. d/b/a CITY ELEVATOR,
MITCHELL HELLMAN, STEPHAN DIEMER, CARL
ALONGIS and KONE, INC.,

Defendants.
-----X

Case No.: 1:17-CV-00051 (PAC)

NOTICE OF MOTION

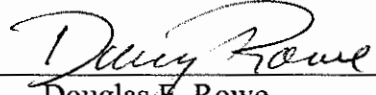
Hon. Paul A. Crotty

PLEASE TAKE NOTICE, that upon the Declaration of Douglas E. Rowe, Esq. dated April 17, 2018 and the exhibits annexed thereto, the Declaration of Steven Tilchen sworn to April 17, 2018, the accompanying Memorandum of Law, and all proceedings had herein, plaintiff STEVEN TILCHEN, by his attorneys, Certilman Balin Adler & Hyman, LLP, will move this Court, before the Honorable Paul A. Crotty, United States District Judge, at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, Court Room 14-C, at a date and time designated by the Court, for an Order pursuant to Rule 15 (a)(2) of the Federal Rules of Civil Procedure permitting Plaintiff to amend his Second Amended Complaint, along with such other and further relief as the Court deems just, equitable and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to Local Rule 6.1 (b)(2) of the United States District Court for the Southern District of New York, answering papers, if any, are to be served so as to be received by the undersigned no later than fourteen (14) days prior to the return date of the within motion once set by the Court.

Dated: East Meadow, New York
April 17, 2018

CERTILMAN BALIN ADLER & HYMAN, LLP

By: 
Douglas E. Rowe
Attorneys for Plaintiff
90 Merrick Avenue, 9th Floor
East Meadow, New York 11554
(516) 296-7000
drowe@certilmanbalin.com

TO: Forcelli, Curto, Deegan,
Schwartz, Mineo & Terrana, LLP
Attorneys for City Elevator Defendants
Elbert Nasis, Esq.
Lisa M. Casa, Esq.
333 Earle Ovington Boulevard, Suite 1010
Uniondale, New York 11553
516-248-1700
ENasis@ForchelliLaw.com
lCasa@ForchelliLaw.com

Ansa Assuncao, LLP
Attorneys for Kone Inc.
Stefanie Ann Bashar, Esq.
707 Westchester Avenue, Suite 309
White Plains, New York 10604
Stefanie.Bashar@ansalaw.com

Dykema Gossett, PLLC
Attorneys for Kone Inc.
Stephen S. Muhich, Esq.
Elisa J. Lintemuth, Esq.
300 Ottawa Ave., NW, Ste. 700
Grand Rapids, Michigan 49503
SMuhich@dykema.com
ELintemuth@dykema.com